

SAPONE & PETRILLO, LLP

William S. Petrillo, Esq., Partner
Edward V. Sapone, Esq., Partner

MANHATTAN

1 Penn Plaza, Suite 5315
New York, New York 10119
Telephone: (212) 349-9000
Facsimile: (212) 349-9003
E-mail: ed@saponepetrillo.com

Chase S. Ruddy, Esq., Senior Associate
Michael Vitaliano, Esq., Associate

LONG ISLAND

1103 Stewart Avenue, Suite 200
Garden City, New York 11530
Telephone: (516) 678-2800
Facsimile: (516) 977-1977
E-mail: william@saponepetrillo.com

April 21, 2020

Hon. Gregory H. Woods
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Irizarry, et al.*
Docket No.: 20-CR-127

Dear Judge Woods:

I am CJA counsel to Defendant Christian Irizarry in the above referenced case. I write in response to the Court's April 18, 2020 Order, and in follow-up to my April 17, 2020 letter motion seeking the appointment of Chase Ruddy, Esq. as associate CJA counsel to Mr. Irizarry *nunc pro tunc* to February 18, 2020.

In response to the Court's query, I would respectfully request that Your Honor approve Mr. Ruddy for 50 hours at \$110 per hour (a total of \$5,500). Mr. Ruddy has already dedicated approximately 15 hours to Mr. Irizarry's case. During that time, Mr. Ruddy has communicated with Mr. Irizarry's family and the government regarding a potential bail application and reviewed pertinent documents, he has coordinated with the government to gain access to and download voluminous electronic discovery, including surveillance video, recorded purchases of narcotics, Title III wiretaps, social media and other categories of evidence, and he has assisted me in reviewing some of that voluminous discovery. Short of Mr. Irizarry's case proceeding to trial, I estimate utilizing Mr. Ruddy's services for approximately a further 35 hours, which would allow him to assist me with further discovery review, communication with Mr. Irizarry, who remains incarcerated, and his family, legal research related to any applicable pretrial motions, and, if applicable, preparing any pre-plea or sentencing submissions. If it appears that Mr. Irizarry's case is likely to proceed to trial, I would anticipate making a further application to Your Honor at that time.

I thank Your Honor for your consideration and wish everyone well.

Application granted. Mr. Ruddy is approved to serve as associate counsel in this case at a rate of \$110 per hour for a total of 50 hours. The Clerk of Court is directed to terminate the motion pending at Dkt. No. 23.
SO ORDERED.
April 22, 2020


GREGORY H. WOODS
United States District Judge

Respectfully submitted,

/s/ Edward V. Sapone
Edward V. Sapone